

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

Tressa Sherrod, et. al.	:	
Plaintiffs,	:	Case No.: 3:14-cv-454
-vs-	:	
	:	District Judge Walter H. Rice
Officer Sean Williams, Et. al.	:	
Defendants,	:	

**DEFENDANTS WAL-MART STORES, INC., WAL-MART STORES EAST, L.P., AND  
WAL-MART STORE #2124 DISCLOSURES OF LAY WITNESSES**

Now come Defendants Wal-Mart Stores, Inc., Wal-Mart Stores East, L.P., and Wal-Mart Store #2124, by and through undersigned counsel, and for their lay witness disclosures identifies the following:

1. Plaintiff Tressa Sherrod. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint including damages;
2. Plaintiff John Crawford, Jr. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint including damages;
3. Plaintiff Lee Cee Johnson. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint including damages;
4. Officer Sean C. Williams. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
5. Sgt. David M. Darkow. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
6. Chief Dennis Evers. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.

7. Officer Robert Lee. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
8. Officer Chris Williams. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
9. Detective Chad Lindsey. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
10. Sgt. Michael Hummel. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
11. Sgt. Scott Molnar. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
12. Detective Brad Plasecki. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
13. Detective Daniel Krall. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
14. Detective Rodney Curd. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
15. Captain Jeff Fiorita. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
16. Captain Eric Grile. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
17. Officer Matthew Stull. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.

18. Officer Kris Brownlee. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
19. Officer John Bondy. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
20. Officer Aaron Nicley. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
21. Joel Diaz. City of Beavercreek Police Department, 1388 Research Park Drive, Beavercreek, Ohio 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
22. John Green. Ohio Peace Officer Training Academy, 1650 OH-56, London, OH 43140. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
23. Deputy Jeff Thomas. Greene County Sheriff's Office, 120 East Main Street, Xenia, OH 45385. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
24. Deputy Jason Tavner. Greene County Sheriff's Office, 120 East Main Street, Xenia, OH 45385. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
25. Deputy Frank Funk. Greene County Sheriff's Office, 120 East Main Street, Xenia, OH 45385. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
26. Sgt. Brad Balonier. Greene County Sheriff's Office, 120 East Main Street, Xenia, OH 45385. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
27. Officer John Adam Minehart. Fairborn Police Department, 70 West Hebble Ave., Fairborn, OH 45324. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
28. Nathan Hiester. Beavercreek Fire Department, 2195 Dayton-Xenia Road, Beavercreek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.

29. Bill Kappeler. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
30. Joshua Wells. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
31. John Mercs. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
32. Ryan Williams. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
33. Micah Blanton. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
34. Alex Ferguson. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
35. Alan Trimbur. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
36. David Hudson. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
37. Rob Young. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
38. Kris Foster. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
39. Dustin Richardson. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.

40. Bruce Armstrong. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
41. Scott Dorsten. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
42. Matt Clark. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
43. Steve Dubois. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
44. Christine Hawker. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
45. Stephen Horne. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
46. Keith Holloway. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
47. Nathan Arndt. Beaver Creek Fire Department, 2195 Dayton-Xenia Road, Beaver Creek, OH 44308. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
48. Heather Voskuhl. Soin Medical Center, 3535 Beaver Creek, OH 45431. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
49. Jeffrey Robinson, M.D., Kettering Health Network. 20 Prestige Plaza, Miamisburg, OH 45324. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
50. Pamela Dyer. Soin Medical Center, 3535 Beaver Creek, OH 45431. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.

51. Kristen Homan. Soin Medical Center, 3535 Beavercreek, OH 45431. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
52. Kaitlin Wilson. Soin Medical Center, 3535 Beavercreek, OH 45431. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
53. Emily Sweet. Miami Valley Hospital, 1 Wyoming St, Dayton, OH 45409. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
54. Marina Hof. Miami Valley Hospital, 1 Wyoming St, Dayton, OH 45409. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
55. Kimberly Hendershot. Miami Valley Hospital, 1 Wyoming St, Dayton, OH 45409. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
56. Pamela Issacs. Miami Valley Hospital, 1 Wyoming St, Dayton, OH 45409. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
57. Timothy Shepherd. 332 West Garland Ave., Fairborn, OH 45324. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
58. Ruthanna Gray. 852 Princeton Ave., Fairborn, OH 45324. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
59. Lisa Mills. 602 Halleck Court, Dayton, OH 45433. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
60. Stacey Glaser. 109 Deubner Drive, Union, OH 45322. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
61. Billie Brewer. 1718 Miami Ave., Fairborn, OH 45324. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
62. Bobbie ODneal. 239 Aleion Place, Cincinnati, OH 45219. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.

63. Travis Williams. 357 Chatham Drive, Fairborn, OH 45324. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
64. Shelli Welller. 81 Brent Drive, Fairborn, OH 45324. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
65. Jeff Sears. 45 Hawthorn Glen Trail, Beavercreek, OH 45440. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
66. Ronald "Tyler" Ritchie. 5119 Worchester Drive, Dayton, OH 45431. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
67. April Marie Ritchie. 5119 Worchester Drive, Dayton, OH 45431. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
68. Rick Wheeler. 2321 Faircreek Ridge Drive, Fairborn, OH 45324. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
69. Dean A. Goehring. 2202 Bandit Trail, Beavercreek, OH 45434. 5119 Worchester Drive, Dayton, OH 45431. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
70. Nathaniel Brooks. 5801 Plumtree Path, Dayton, OH 45415. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
71. Nicole Ebright. 58 Stillwell Drive, Dayton, OH 45431. Personal knowledge regarding facts and circumstances surrounding allegations set forth in Plaintiffs' Complaint.
72. Sean Espy. Wal-Mart, 3360 Pentagon Blvd., Beavercreek, OH 45431. Wal-Mart Store Manager at time of incident. Personal knowledge regarding the facts and circumstances surrounding allegations set forth in Plaintiff's Complaint.
73. Denise Wolford. 3360 Pentagon Blvd., Beavercreek, OH 45431. Wal-Mart Assistant Store Manager at time of incident. Personal knowledge regarding the facts and circumstances surrounding allegations set forth in Plaintiff's Complaint.
74. Jessica Thomas. 3360 Pentagon Blvd., Beavercreek, OH 45431. Wal-Mart Assistant Store Manager at time of incident. Personal knowledge regarding the facts and circumstances surrounding allegations set forth in Plaintiff's Complaint.



75. Shannon Berry. Wal-Mart, 3360 Pentagon Blvd., Beavercreek, OH 45431. Wal-Mart Loss Prevention Manager at time of incident. Personal knowledge regarding the facts and circumstances surrounding allegations set forth in Plaintiff's Complaint.
76. Corey Brooks. Wal-Mart, 3360 Pentagon Blvd., Beavercreek, OH 45431. Wal-Mart Associate at time of incident. Personal knowledge regarding the facts and circumstances surrounding allegations set forth in Plaintiff's Complaint.
77. Sharon Henry. Wal-Mart, 3360 Pentagon Blvd., Beavercreek, OH 45431. Wal-Mart Associate at time of incident. Personal knowledge regarding the facts and circumstances surrounding allegations set forth in Plaintiff's Complaint.
78. Michaela Menz. Wal-Mart, 3360 Pentagon Blvd., Beavercreek, OH 45431. Wal-Mart Associate at time of incident. Personal knowledge regarding the facts and circumstances surrounding allegations set forth in Plaintiff's Complaint.
79. Any witness who has been deposed and or provided a statement to the authorities.
80. All lay witnesses identified by any party; as upon cross-examination.

At this time, Plaintiffs' theories of this case are uncertain. Therefore, Defendants reserve the right to timely amend and or supplement this witness list based upon Plaintiffs' theories of this case as they are put forth.

Respectfully submitted,

/s/ D. Patrick Kasson

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Store #2124*

/s/ Kevin E. Hexstall

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*Pro Hac Vice Attorney for Defendants Wal-  
Mart Stores, Inc., Wal-Mart Stores East, L.P.,  
and Wal-Mart Store #2124*



**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served upon the following, via electronic mail and regular mail, this 2<sup>nd</sup> day of November 2015.

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/s/ Pat Kasson

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